



May 30, 2024

Hon. Peggy Kuo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201
VIA ECF ONLY

Re: *Shkolir, et. al v. RX2GO, Inc., et. al.*; 1:23-cv-7256-OEM-PK (EDNY)
MOTION TO EXTEND TIME TO COMPLETE MEDIATION


Your Honor:

I represent the Plaintiffs in the above-referenced action. Pursuant to Your Honor's Minute Entry and Order of May 17, 2024, the deadline for the parties to complete mediation is June 28, 2024. Plaintiffs respectfully request an extension of 30 days, to July 28, 2024, to complete mediation.

The reason for this request is that while the parties have agreed on Robert J. Kheel to mediate the case, the mediator's schedule is full in the month of June and we are looking at dates in July. Due to scheduling challenges, we have not yet been able secure a specific date but we are working diligently to schedule mediation as soon as possible.

Pursuant to the Court's individual practice standards, the following is offered:

- a. The original date to hold mediation: May 17, 2024; the court extended it to June 28, 2024, at the pre-motion conference on May 17, 2024.
- b. The reason for the request: See above.
- c. The number of previous requests for adjournment or enlargement: None.

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- d. Whether these previous requests were granted or denied: No previous requests have been made.
- e. Whether the adversary consents, and, if not, the reasons given by the adversary for refusing to consent: Opposing counsel consents to this request.

This request is not anticipated to impact or affect any other deadlines in this case.

Thank you for your consideration.

Sincerely,



Penn Dodson, Esq.

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